

## Comments on 771 DOP Mod 5

Section 1.1 The alternatives analysis for the portions of the building that will remain in place is not contained in the ER RSOP for soil remediation. The alternatives analysis in the ER RSOP is for soil, not buildings.

Section 4.4.2 All removable contamination will be removed, not covered up, fixed, or encapsulated. Building structures above six feet below grade will be decontaminated to free release or removed. Building structures and concrete remaining in place below six feet below final grade will be decontaminated so that residual fixed contamination does not exceed 7 nCi/g by volume. Excessive levels of fixed surficial contamination on concrete remaining in place below six feet will be also be removed.

Remove the last bullet in this section or remove implication that it is from the RFCA modification.

Section 4.4.4 This section would make more sense if the first paragraph was edited to reflect current status of the room. Separate what has been done from what will be done.

What is the "release criteria" that encapsulation is indicated to meet? Exactly what is the "main building structure" that is to be demolished? Is removal of room 141 not going to occur prior to building demolition? Will the rest of the slab be removed after or prior to building demolition?

Add a bullet saying that removable contamination will be removed and fixed contamination on outer walls will also be fixed.

Section 4.6 The PDS will also need to be performed to identify the levels and location of contamination remaining.

Figures 4 and 5 Update figures to reflect current proposed land configuration.

Figure 5 This figure is difficult to understand and needs, at the least, the floors labeled.

Section 4.7.1 It is indicated that steel plates may be utilized to "encapsulate" the remaining contamination. Steel plating must be removed and cannot be left after demolition. It is recommended that Instacote be considered rather than steel plate.

Section 4.7.3 Based on current and planned surface configuration, the tunnels (specifically the tunnel from B771 to the stack) may need to be removed or partly removed.

Section 5.5 Why are the compaction requirements as identified in the RSOP for Recycling Concrete not included?

Section 6.1.1.2 Why is it indicated that surveys will verify surfaces are at or below the release criteria for *removable* rad contamination? What about fixed contamination? Does this indicate that removable contamination is going to be fixed rather than removed? What about other removable contamination, such as beryllium?

Sections 7 and 8 See Section 1.1 comment.

Section 10 Add a bullet including drawn-to-scale maps of anything left behind after demolition, for example, slabs, tunnels, walls, piping, etc. be added to the Decommissioning Closure Report.

